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**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

IN RE: UBER TECHNOLOGIES, INC.,  
PASSENGER SEXUAL ASSAULT  
LITIGATION,

This Document Relates to:  
  
ALL ACTIONS

Case No. 3:23-md-03084-CRB

**STIPULATION AND [PROPOSED]  
ORDER REGARDING ENLARGEMENT  
OF PAGE LIMITS FOR MOTION TO  
DISMISS AMENDED BELLWETHER  
COMPLAINTS**

Judge: Hon. Charles R. Breyer  
Courtroom: Courtroom 6 – 17th Floor

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**STIPULATION**

**WHEREAS**, on December 12, 2024, the Court ordered the parties to select ten bellwether cases each, for a total of twenty, by February 14, 2025, *see* Dkt. 1950;

**WHEREAS**, Plaintiffs and Defendants Uber Technologies, Inc., Rasier, LLC, and Rasier-CA, LLC (“Uber”) submitted their bellwether selections on February 21, 2025, Dkts. 2373, 2375;

**WHEREAS**, Plaintiffs filed 19 amended bellwether complaints on March 14, 2025, Dkts. 2497, 2499-2516;

**WHEREAS**, one bellwether plaintiff, Jane Roe CL 68, “intends to proceed on her original complaint, and d[id] not seek to amend,” *see* Dkt. 2629;

**WHEREAS**, Uber’s Rule 12 motions to dismiss the bellwether complaints are due on or before April 15, 2025, Dkt. 1950;

**WHEREAS**, Plaintiffs’ oppositions to Rule 12 motions to dismiss the bellwether complaints are due on or before May 15, 2025, *id.*;

**WHEREAS**, Uber’s replies in support of Rule 12 motions to dismiss the bellwether complaints are due on or before June 2, 2025, *id.*;

**WHEREAS**, the complaints of the 20 bellwether plaintiffs raise legal questions that can be addressed in a single Rule 12 motion and, by doing so, would promote judicial economy and preserve resources;

**WHEREAS**, Uber requests that it be granted 40 pages for a single, omnibus Rule 12 motion, and memorandum of points and authorities in support, addressing all 20 bellwether plaintiffs’ complaints;

**WHEREAS**, Plaintiffs consent to Uber’s request, and further request a reciprocal extension of the page limit for a single, omnibus opposition brief of 40 pages;

**WHEREAS**, Uber requests that it be granted 20 pages for an omnibus reply brief in support of its Rule 12 motion, to which Plaintiffs agree;

**THEREFORE**, the parties respectfully request the Court enter the parties’ stipulation that:

1 1. Uber shall be granted up to 40 pages for a single, omnibus Rule 12 motion, and  
2 memorandum of points and authorities in support, addressing all 20 bellwether plaintiffs'  
3 complaints;

4 2. Plaintiffs shall be granted up to 40 pages for any Opposition to Uber's Rule 12 motion;

5 3. Uber shall be granted 20 pages for its reply in support of its Rule 12 motion.

6 **IT IS SO STIPULATED.**

7  
8 Dated: April 11, 2025

Respectfully submitted,

9 **PAUL WEISS, RIFKIND, WHARTON &**  
10 **GARRISON LLP**

11 By: /s/ Randall S. Luskey  
12 RANDALL S. LUSKEY  
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22 *Attorneys for Defendants*  
23 UBER TECHNOLOGIES, INC.,  
24 RASIER, LLC, and RASIER-CA, LLC  
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1 Dated: April 11, 2025

Respectfully submitted,

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Co-Lead Counsel for Plaintiffs

**FILER'S ATTESTATION**

I, Sabrina H. Strong, am the ECF User whose ID and password are being used to file this document. In compliance with Civil Local Rule 5-1(i)(3), I hereby attest that each of the signatories identified above has concurred in this filing.

Dated: April 11, 2025

/s/ Sabrina H. Strong  
SABRINA H. STRONG

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

IN RE: UBER TECHNOLOGIES, INC.,  
PASSENGER SEXUAL ASSAULT  
LITIGATION,

Case No. 3:23-md-03084-CRB

**[PROPOSED] ORDER REGARDING  
ENLARGEMENT OF PAGE LIMITS FOR  
MOTION TO DISMISS AMENDED  
BELLWETHER COMPLAINTS**

Judge: Hon. Charles R. Breyer  
Courtroom: Courtroom 6 – 17th Floor

The Court hereby GRANTS the parties' stipulation as follows:

1. Uber shall be granted up to 40 pages for a single, omnibus Rule 12 motion, and memorandum of points and authorities in support, addressing all 20 bellwether plaintiffs' complaints;
2. Plaintiffs shall be granted up to 40 pages for any Opposition to Uber's Rule 12 motion;
3. Uber shall be granted 20 pages for its reply in support of its Rule 12 motion.

**PURSUANT TO STIPULATION, IT IS SO ORDERED.**

DATED: \_\_\_\_\_

\_\_\_\_\_  
HON. CHARLES R. BREYER  
UNITED STATES DISTRICT JUDGE